

THE KENTUCKY TRANSPORTATION CABINET LANGUAGE ACCESS PLAN

January 1, 2018 – December 31, 2018

Greg Thomas, KYTC Secretary

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Office for Civil Rights and Small Business Development

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Glossary/Definitions

Auxiliary Aids includes qualified interpreters, assistive listening systems (loop FM and infrared), television captioning and decoders, video tapes, both open and closed captioned, TTY's, transcriptions, reader, taped texts, Braille and large print materials. Any similar device or service needed to make spoken or aural language accessible is also considered an auxiliary aid.

Certified Interpreter/Translator a person who has passed the required language fluency examination in the certified languages or has passed a certified translation examination offered by another organization. Language fluency includes an understanding of non-verbal and cultural patterns to communicate in that language. The person must understand the client's culture and be able to intergrade that understanding into the translation of written material.

Qualified interpreter - 28 C.F.R. 36.303(b)(1) is defined in the regulation to mean an interpreter who is able to interpret effectively, accurately and impartially both receptively and expressively using any necessary specialized vocabulary.

Direct "In-Language" Communication – Monolingual communication in a language other than English between a multilingual staff and an LEP person (e.g., Korean to Korean).

Effective Communication – Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communications with others when providing similar programs and services.

KYTC is the abbreviation used for Kentucky Transportation Cabinet.

Interpretation – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.

Language Assistance Services – Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities or other programs administered by the Department.

Limited English Proficient (LEP) individuals – Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding) but still be LEP for other purposes (e.g., reading or writing).

Meaningful Access – Language assistance that results in accurate, timely and effective communication at no cost to the LEP individual.

Primary Language – An individual's primary language is the language in which an individual most effectively communicates.

Program or Activity – The term "program or activity" and the term "program" mean all of the operations of the Department.

Qualified Translator or Interpreter – An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate through court certification or authorized to do so by contract with the Department or by approval of his or her component.

Sight Translation – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

Sign Language and Sign Systems -Visual or tactile ways of communicating thoughts, ideas and feeling through American Sign Language or manual signs and gestures with specifically defined vocabulary.

Translation – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

Vital Document – Paper or electronic written material that contains information that is critical for accessing a component's program or activities or required by law.

Written Communication - KYTC publications, documents and department forms that:

- Describe services, client's rights and responsibilities or changes in benefits, eligibility or service; or
- Request information from a client, a response on the part of a client, or notify a client or an adverse action; or
- Require a client's signature or informed consent.



Matthew G. Bevin
Governor

COMMONWEALTH OF KENTUCKY
TRANSPORTATION CABINET
Frankfort, Kentucky 40622
www.transportation.ky.gov/

Greg Thomas
Secretary

LANGUAGE ACCESS POLICY STATEMENT

OFFICIAL ORDER 111208

The Kentucky Transportation Cabinet (KYTC) seeks to provide Limited English Proficient (LEP) persons with meaningful access to programs and activities conducted by KYTC. All KYTC staff shall take reasonable steps to ensure that LEP individuals are provided appropriate language assistance services and to inform the public of the availability of language accessible programs and activities.

To ensure KYTC's effective implementation of LEP policies, the Office for Civil Rights and Small Business Development (OCSBD) shall:

1. Designate a Title VI Coordinator as manager of all language services to ensure provision of meaningful access to LEP individuals in accordance with KYTC's Language Access Plan.
2. Post the policy statement on the OCSBD website, as well as the primary contact information of the Title VI Coordinator for question and comments regarding language access issues related to programs and activities conducted by KYTC;
3. Implement appropriate outreach efforts to publicize the language access policy;
4. Perform a capacity and needs assessment for language assistance services every three years for review by KYTC's Office of the Secretary; and,
5. Arrange for quality language assistance services as needed by LEP individuals participating in KYTC programs and activities.

This policy shall be prominently posted in all KYTC personnel offices, EEO offices, and on the Cabinet's intranet site.

Signed and approved this 12 day of January, 2018


Jamir Davis, Executive Director OCSBD



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Matthew G. Bevin
Governor

COMMONWEALTH OF KENTUCKY
TRANSPORTATION CABINET

Frankfort, Kentucky 40622
www.transportation.ky.gov/

Greg Thomas
Secretary

TITLE VI POLICY STATEMENT

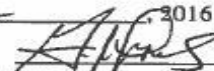
OFFICIAL ORDER 110249

It is the policy of the Kentucky Transportation Cabinet ("Cabinet") to afford equal opportunity to all persons to the end that no person in the United States shall, on the grounds of race, color, sex, disability, age or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation.

Program and activities to which this policy applies include, but are not limited to, the use of grants in connection with federal-aid highway systems, the Surface Transportation and Reauthorization & Reform Act of 2015, the Highway Safety Act of 1966 and the National Traffic and Motor Vehicle and Safety Act of 1966, leases of real property and the grant of permits, licenses, easements and rights of way covering real property, Urban Mass Transportation Research Programs, and other grants for the support of basic scientific research.

This policy shall be prominently posted in all personnel office, EEO offices, and on the Cabinet's internal website.

Signed and approved this 27th day of June, 2016


Greg Thomas, Secretary
Kentucky Transportation Cabinet

APPROVED AS TO FORM AND LEGALITY


Todd Shipp, Esq., Special Assistant
Office of Legal Services

I have read this policy statement and understand the provisions contained within and acknowledge the receipt of this policy.

Signature _____ Date _____

Social Security Number _____



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I. Introduction

The Kentucky Transportation Cabinet (KYTC) must identify Limited English Proficient (LEP) individuals and inform LEP persons that language assistance services are available. If language assistance services are requested the staff must take all reasonable steps to provide language assistance to LEP individuals. It is the responsibility of the Office for Civil Rights and Small Business Development (OCRSBD) to provide free access to language assistance services for all contacts with limited English proficient (LEP) individuals.

The (OCRSBD) has prepared this Language Access Plan (LAP) for the purposes of defining the protocol and procedures taken by KYTC to ensure meaningful and universal access to KYTC services, programs and activities on the part of persons who self-identify as having limited English proficiency or preference for materials and services in a preferred language.

KYTC defines a LEP person as someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Agency staff. A client maintains the right to self-identify as an LEP person, as well as the right to indicate their language of preference,

II. Policy Directives

- 1) It is the policy of the Office for Civil Rights and Small Business Development staff to take reasonable steps to provide LEP persons with meaningful access to all programs or activities.
Staff Training. A policy directive on staff training may dictate the frequency, curriculum, and target personnel for ongoing training. For example, this policy directive may mandate training particular to management, interpreters, translators, or frontline staff who encounter LEP individuals.
- 2) It is the responsibility of KYTC and not the LEP person to ensure that communications between KYTC and the LEP person are not impaired because of the limited English proficiency of the individual.

Bilingual Staff. A policy directive on bilingual staff may state a policy that second language skills are a desired characteristic, prescribe the hiring process for bilingual staff, provide the mechanism for designating jobs as bilingual, when and how to test the competency of prospective or current bilingual staff, define which staff are “bilingual,” and/or additional remuneration for bilingual staff.

- 3) KYTC staff must take reasonable steps to inform the public of the availability of language accessible programs and activities.

Performance Measurement. A policy directive on performance measurement may order the frequency and manner of monitoring and oversight. For example, an agency may elect to conduct an audit of language assistance services on an annual basis.

A. Purpose and Authority

The purpose of this plan is to eliminate or reduce barriers while providing guidance on how to access and fulfill KYTC’s commitment to ensuring citizens of the Commonwealth of Kentucky and adjoining communities have safe, timely, and meaningful access to KYTC’s offices and services. While most people in Kentucky read, write, speak and understand the English



language, English is not their spoken primary language. Those individuals may not be able to participate in the activities funded by KYTC and thus have meaningful access to it.

B. Executive Order

On August 11, 2000, President Bill Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP) and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

To assist federal agencies in carrying out these responsibilities, the U.S. Department of Justice has issued a Policy Guidance Document, "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With Limited English Proficiency" (2002 LEP Guidance). This LEP Guidance sets forth the compliance standards that recipients of federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination.

C. Title VI of the Civil Rights Act

Title VI of the Civil Rights Act of 1964 states that "No person" shall be excluded from participation, denied benefits, or subjected to discrimination based upon race, color or national origin.

D. Federal, State and Local Regulations

The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), affirmed then Department of Health, Education, and Welfare (HEW) policy (in line with HEW's Title VI regulation which is similar to that of DOJ, 45 CFR 80.3(b) (2)), stating that a recipient's failure to ensure meaningful opportunity to national origin minority, limited-English proficient persons to participate in the Federally funded program violates Title VI and Title VII regulations. In the *Lau* case, a San Francisco school district that had a significant number of non-English speaking students of Chinese origin was required to take reasonable affirmative steps to provide them with a meaningful opportunity to participate in the federally funded education program. The requirement to provide meaningful access under Title VI applies beyond the education context to include all of the programs and activities of all recipients of federal financial assistance.

The US Department of Justice (DOJ) (67 Fed. Reg. 41455, 41457, 41471 (June 18, 2002))-adopted final guidance, "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons." The DOJ Guidance outlines four factors that should be considered to determine when language assistance might be required to ensure such meaningful access, and it identifies cost effective measures to address those language needs.

The US Department of Transportation (Federal Register, Volume 70, No. 239, 74087) issued LEP guidance for recipients on December 14, 2005 found in "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons." The guidance is



based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects Limited English Proficient (LEP) Persons.

The United States Department of Transportation (USDOT) is also developing an LEP Action Plan and has directed all Modal Agencies to perform self-assessments.

FHWA Office of Civil Rights will be sending a Self-Assessment Survey to the division offices and Resource Center.

FHWA division offices are responsible for ensuring that State Transportation Administrations (STAs) are LEP compliant.

E. General Policy & Personnel Compliance

KYTC seeks to provide LEP persons with meaningful access to programs and activities. All KYTC staff accordingly shall take reasonable steps to ensure that LEP individuals are provided appropriate language assistance services and to inform the public of the availability of language accessible programs and activities.

KYTC staff will take reasonable steps to provide language assistance services to LEP individuals when they encounter or have reason to believe that they may encounter LEP individuals in the course of fulfilling their job duties. This directive is intended only to improve the internal management of the Kentucky Transportation Cabinet language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the KYTC, its officers or employees or any person. Because this document is intended for the internal management of the KYTC language access program, it is not intended to be cited in any judicial or administrative proceeding. Administration of the programs discussed herein is within the sole discretion of the Department and its components.

F. Safe Harbor-Language Assistance Measures

The type of language assistance necessary to provide meaningful access will vary depending on the type of communication staff is having with the LEP person (e.g. phone, in person or written communication) and in some circumstances more than one method will work. Regardless of how the language assistance is provided, we recognize the importance of providing such services in a timely manner and in an appropriate place. Failure to do so may effectively delay or deny LEP language assistance measures and services. KYTC has chosen to follow the Safe Harbor rule to assist us in determining when to provide translation of vital documents. The Safe Harbor rule for written translation of vital documents is based on the number and percentages of the market area-eligible population or current beneficiaries and applicants that are LEP. According to the Safe Harbor Rule:

KYTC expects translation of vital documents when the eligible LEP population in the market area or current beneficiaries *exceeds 1,000 persons or if it exceeds 5% of the eligible population or beneficiaries along with more than 50 people*. In cases where more than 5% of the eligible population speaks a specific language, but fewer than 50 persons are affected, there should be a translated written notice of the person's right to an oral interpretation.

KYTC's *safe harbor rule is not applicable to oral communication*. In other words, KYTC has an obligation to provide oral language assistance regardless of the number or percentage of

persons who comprise a specific language group at a site or in the service area. The degree to which KYTC will provide oral language assistance will depend on the nature and importance of the activity:

KYTC will provide free language assistance to LEP individuals for important, critical junctures, such as assistance with the application, the application interview, recertification, transportation related matters (including any discussions regarding the need for reasonable accommodation) and related meetings, and relocation and displacement issues.

If a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons (whichever is less) of the total population of persons eligible to be served/affected/encountered, such action will be considered strong evidence of compliance with recipient's written translation obligations.

III. Language Assistance Services

- A. Identification of person who will implement the plan:** The KYTCs Office of Civil Rights and Small Business Development (OCRSBD) is responsible for providing guidance and oversight for implementing the provisions of Executive Order 13166 and this Language Access Plan. To ensure consistency and accountability across the agency, OCRSBD will coordinate efforts with all other Departments within the KYTC to impose agency wide standards for ensuring quality assurance of language services. The designated OCRSBD official that leads the development, implementation and monitoring of the LAP can be contacted at:

Vincent C. Thomas, Sr. Administrative Branch Manager/Title VI Officer
Kentucky Transportation Cabinet
Office for Civil Rights and Small Business Development
200 Mero Street, Frankfort, KY 40622
(502) 564-3601
Vincent.Thomas2@ky.gov

B. Types of Services

- a. **Interpreter Services** refers to the oral conversion of communication from one language to another language while retaining the same meaning. An interpreter listens to a communication in one language and orally translates it into another language. A qualified interpreter has generally undergone specialized training or certification; however, certification is not a requirement. When using interpreters, KYTC should ensure that they meet the following criteria:
1. Demonstrate proficiency in the ability to communicate information accurately in both English and in the other language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation);
 2. Have knowledge in both languages or any specialized terms or concepts peculiar to the entity's program or activity and of any particularized vocabulary and phraseology used by the LEP person, and understand and follow confidentiality and impartiality rules to the same extent the recipient employee for whom they are interpreting and/or the extent their position requires.



3. Understand and adhere to their role as interpreters without deviating into role as counselor, legal advisor or other roles.
4. Quality and accuracy of language services is critical with transportation services but does not have to meet the same exacting standards as in a health or legal service area.

C. Translation Services

Involves replacing written text from one language into an equivalent written text in another language. A translator provides this service. A qualified translator is generally required to have undergone specialized training. This individual is an in house or contracted person who has demonstrated his or her competence to translate through passage of an approved language skills assessment and is authorized to do so through KYTC.

D. Vital Documents

After completing the four-factor analysis, KYTC will determine an effective plan to translate vital written documents into the language of each frequently encountered LEP group eligible to be served and likely to be affected by KYTC programs. Vital documents include but are not necessarily limited to the following types of materials:

1. Consent and complaint forms
2. Intake forms with the potential for important consequences
3. Written notices of rights, denial, loss, or decreases in benefits or services and other hearings.
4. Notices advising LEP persons of free language assistance
5. Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which knowing English is not required.
6. Applications to participate in a recipient's program or activity or to receive recipient benefits or services.
7. Information on agency website.

E. Notice of language assistance services

Federal agencies and recipients must make reasonable efforts to notify the public of their eligibility for benefits, programs and services in a language they understand. Agencies should assess all points of contact: telephone, in-person, mail, and electronic communication its staff has with the public and LEP individuals when determining the best method of providing notice of language assistance services. Methods used to inform LEP individuals about language assistance services may include translating outreach materials into other languages, updating non-English content in key languages on the main page of the program website and providing public service messages in non-English media describing your programs.

KYTC's Notice to the Public (**Appendix 4**) will be posted in locations throughout KYTC's central office and district offices. This information is also in KYTC's Title VI plan, which are posted on our website.



F. I Speak Cards

Current applicants or beneficiaries of our programs or services should also receive notice and information about available language assistance services. This may be accomplished with effective program specific notices such as forms, brochures, language access posters placed in conspicuous locations describing in multiple languages the availability of language assistance services, the use of “I Speak” language identification cards, and by including instructions in non-English languages on telephone menus. **Phone number(s) will-be-provided at KYTC’s Frankfort, KY central and regional driver’s license field offices in the Commonwealth.**

KYTC’s I Speak Cards (**Appendix 6**) will be posted in locations throughout KYTC’s central office and district offices. This information is also in KYTC’s Title VI plan, which is posted on our website.

G. Staff Training on Policy and Procedures

Staff will not be able to provide meaningful access to LEP individuals if they do not receive training on language access policies and procedures, including how to access language assistance services. This training should be mandatory for staff who have the potential to interact or communicate with LEP individuals, staff whose job it is to arrange for language assistance services, and managers. Training should explain how staff can identify the language needs of an LEP individual, access and provide the necessary language assistance services, work with interpreters, request document translations, and track the use of language assistance services. Bilingual staff members who communicate “in-language” to LEP individuals, or who serve as interpreters or translators, should be assessed and receive regular training on proper interpreting and translation techniques, ethics, specialized terminology and topics as needed. Without periodic assessment and training, bilingual staff may not be able to provide the language assistance services necessary to ensure LEP individuals have meaningful access to your agency’s programs.

H. Identification of funding and procurement issues

Each individual office or department will be responsible for hiring interpreters, if needed, and they will hire bi-lingual staff with regard to budgetary limitations.

I. Monitoring and updating of policies, plan, and procedure

For KYTC language access program to continue to be effective, we must periodically monitor, evaluate, and update the plan, policies and procedures. The Title VI coordinator will also act as the language access coordinator responsible for monitoring, evaluating and updating the language access program. Monitoring the effectiveness of KYTC program may include:

1. Conducting customer satisfaction surveys of LEP individual is based on their experiences utilizing KYTC programs and services.
2. Observing and evaluating agency interactions with LEP individuals.
3. Soliciting feedback from community based organizations and other stakeholder’s about the effectiveness and performance in ensuring meaningful access for LEP individuals
4. Monitoring the agency’s response rate to complaints or suggestions by LEP individuals, community members or employees regarding language assistance services provided.



J. Sub recipient monitoring

In monitoring sub-recipients, KYTC will utilize a capacity and needs assessment to determine if the needs of LEP individuals are being met. The KYTC will seek continual feedback from constituents and monitor the LEP portion of the sub-recipient's Title VI plan to ensure compliance. This monitoring is conducted on a triennial basis or as directed by Federal Highway Administration (FHWA)/Federal Transit Authority (FTA).

K. Identification and assessment of LEP communities

The KYTC will complete a self-assessment tool to determine the proportion of LEP person from each language group in its service areas to determine appropriate language assistance services.

L. Four Factor Analysis

Complying with Limited English Proficiency (LEP) – Four Factor Analysis

A person who does not speak English as their primary language and has the limited ability to read, speak, write or understand English are limited English Proficient (LEP). LEP persons may be entitled to language assistance depending on the type of service, program or activity. Individuals that identify themselves as speaking English less than “very well” are considered to be Limited English Proficient based upon their self-identified limited ability to read, write, speak or understand English, therefore it can be inferred that it is difficult for LEP individuals to have meaningful access to programs and services that are offered by KYTC.

In order to determine if written or oral communication must be translated and what languages they must be translated to, a four-factor analysis is used. The four-factor analysis considers the following:

1. The number or proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come in contact with the program, activity, or service.
3. The nature and importance of the program, activity, or service provided by the program.
4. The resources available to the recipient and costs.
 - A) It is recognized that developing English, Spanish, French, Mandarin and other languages would provide a valuable resource for the Limited English Proficiency (LEP) population.

Factor 1 – The number or portion of LEP Persons served or encountered in the eligible service population

Based on data from the U.S. 2010¹ census Kentucky's total population is estimated to be 4,339,367; the breakdown of the total population is as follows:

White – 87.6%

Black or African American - 7.9%

Hispanic or Latino – 3.1%

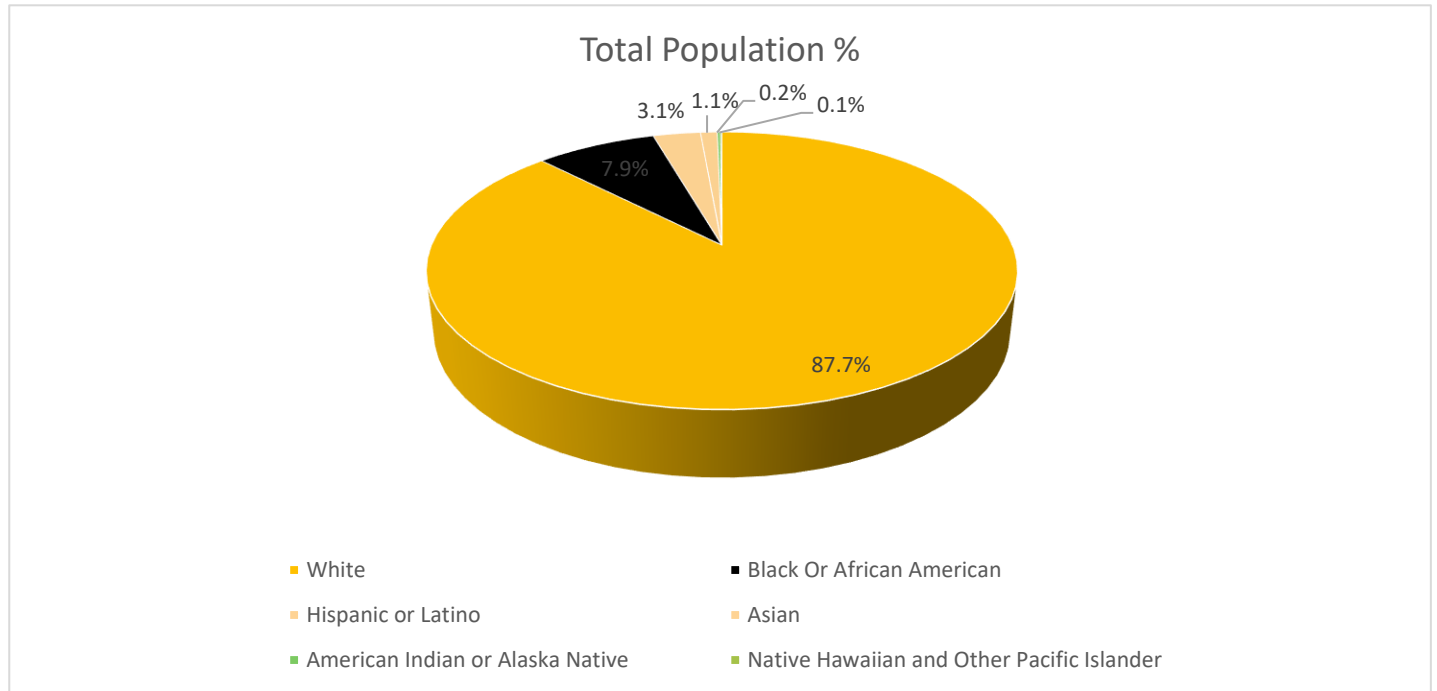
Asian – 1.1%

American Indian or Alaska Native – 0.2%

¹ Source: U.S. Census Bureau, Table QT-P3 - Race and Hispanic or Latino Origin 2010 (data Set 2010 Census Summary File 1)

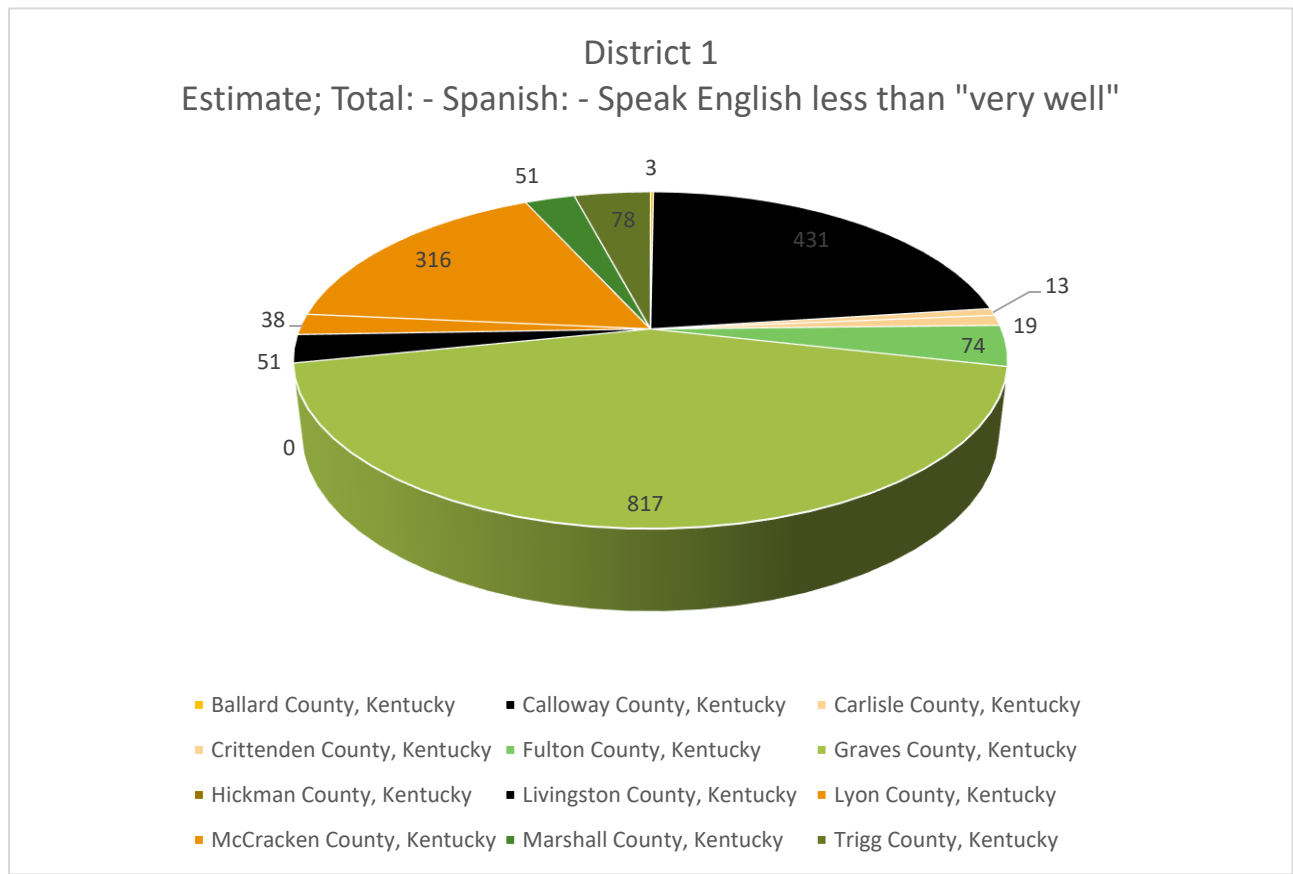


Native Hawaiian and Other Pacific Islander – 0.1%



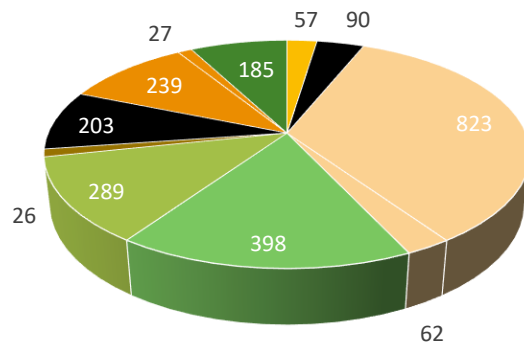
According to the data from the U.S. Census Hispanics or Latinos make up approximately three percent of Kentucky's total population, therefore since it is the state's largest LEP demographic KYTC will focus its analysis on this group. Language assistance is available to other LEP speaking individuals if the need presents itself.

Kentucky has 120 counties. The following charts show the LEP breakdown of the population that speaks Spanish.



District 2

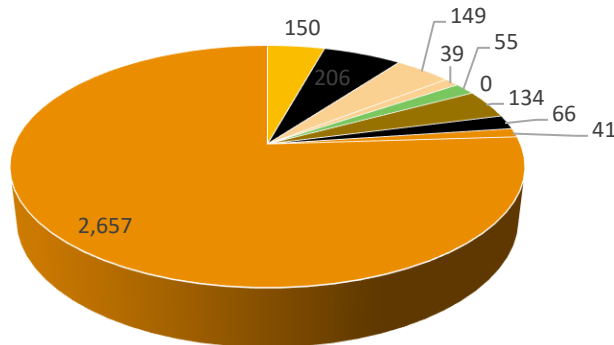
Estimate; Total: - Spanish: - Speak English less than "very well"



- Caldwell County, Kentucky
 Christian County, Kentucky
 Daviess County, Kentucky
- Hancock County, Kentucky
 Henderson County, Kentucky
 Hopkins County, Kentucky
- McLean County, Kentucky
 Muhlenberg County, Kentucky
 Ohio County, Kentucky
- Union County, Kentucky
 Webster County, Kentucky

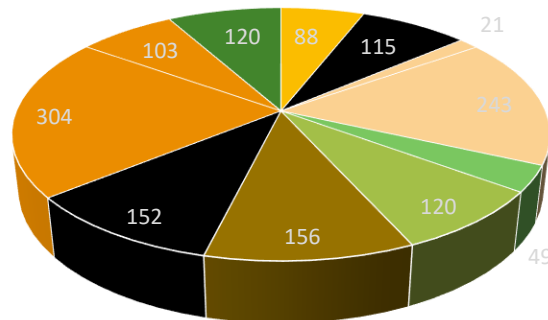
District 3

Estimate; Total: - Spanish: - Speak English less than "very well"



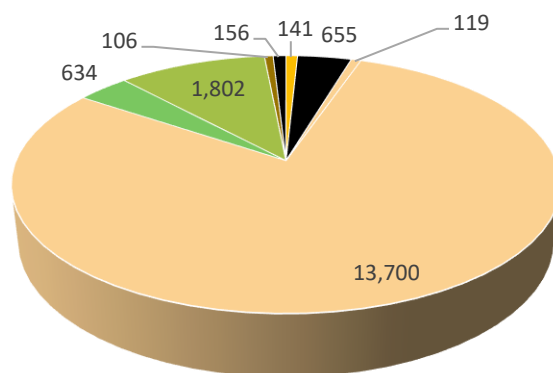
- Allen County, Kentucky
 Barren County, Kentucky
 Butler County, Kentucky
- Edmonson County, Kentucky
 Logan County, Kentucky
 Metcalfe County, Kentucky
- Monroe County, Kentucky
 Simpson County, Kentucky
 Todd County, Kentucky
- Warren County, Kentucky

District 4
 Estimate; Total: - Spanish: - Speak English less than "very well"



- Breckinridge County, Kentucky
- Grayson County, Kentucky
- Green County, Kentucky
- Hardin County, Kentucky
- Hart County, Kentucky
- Larue County, Kentucky
- Marion County, Kentucky
- Meade County, Kentucky
- Nelson County, Kentucky
- Taylor County, Kentucky
- Washington County, Kentucky

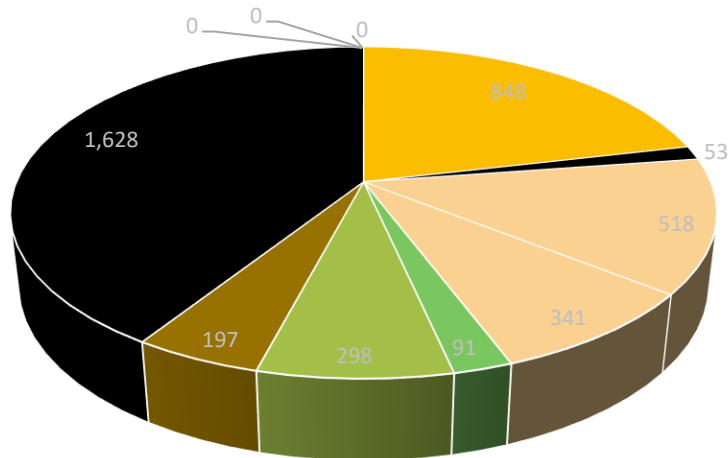
District 5
 Estimate; Total: - Spanish or Spanish Creole: - Speak English less than "very well"



- Bullitt County, Kentucky
- Franklin County, Kentucky
- Henry County, Kentucky
- Jefferson County, Kentucky
- Oldham County, Kentucky
- Shelby County, Kentucky
- Spencer County, Kentucky
- Trimble County, Kentucky

District 6

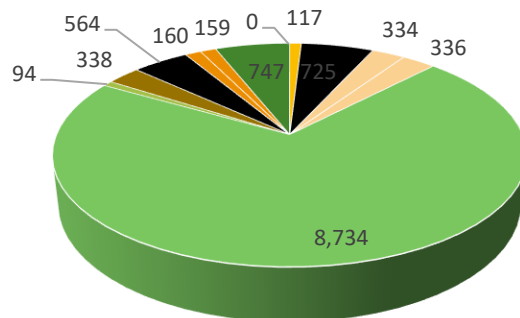
Estimate; Total: - Spanish: - Speak English less than "very well"



- Boone County, Kentucky
- Bracken County, Kentucky
- Campbell County, Kentucky
- Carroll County, Kentucky
- Gallatin County, Kentucky
- Grant County, Kentucky
- Harrison County, Kentucky
- Kenton County, Kentucky
- Owen County, Kentucky
- Pendleton County, Kentucky
- Robertson County, Kentucky

District 7

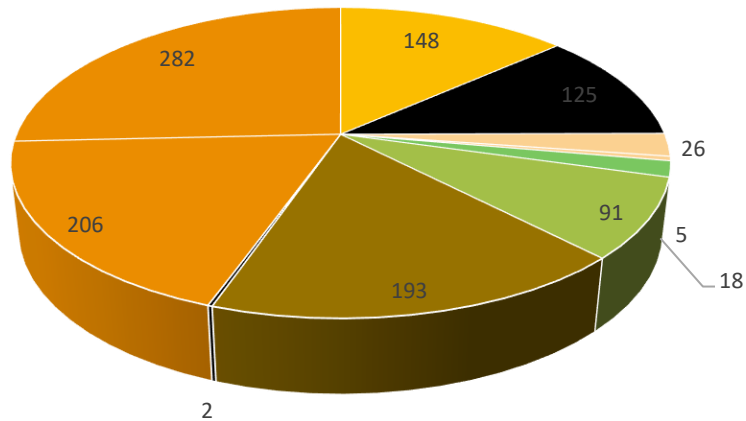
Estimate; Total: - Spanish or Spanish Creole: - Speak English less than "very well"



- Anderson County, Kentucky
- Bourbon County, Kentucky
- Boyle County, Kentucky
- Clark County, Kentucky
- Fayette County, Kentucky
- Garrard County, Kentucky
- Jessamine County, Kentucky
- Madison County, Kentucky
- Mercer County, Kentucky
- Montgomery County, Kentucky
- Scott County, Kentucky
- Woodford County, Kentucky

District 8

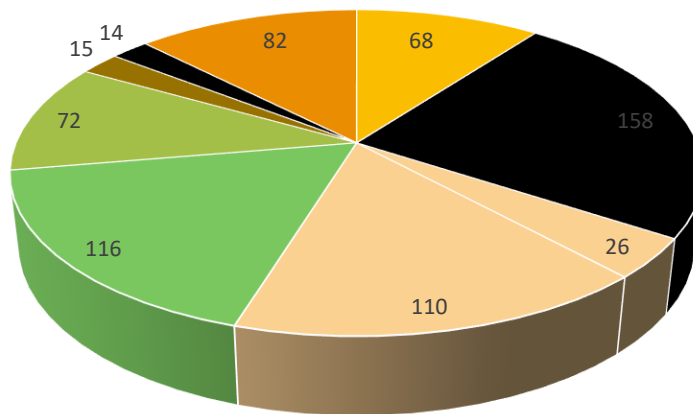
Estimate; Total: - Spanish: - Speak English less than "very well"



- Adair County, Kentucky
- Casey County, Kentucky
- Clinton County, Kentucky
- Cumberland County, Kentucky
- Lincoln County, Kentucky
- McCreary County, Kentucky
- Pulaski County, Kentucky
- Rockcastle County, Kentucky
- Russell County, Kentucky
- Wayne County, Kentucky

District 9

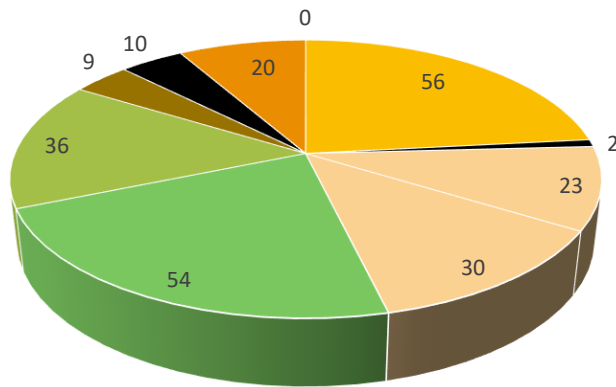
Estimate; Total: - Spanish: - Speak English less than "very well"



- Bath County, Kentucky
- Boyd County, Kentucky
- Carter County, Kentucky
- Elliott County, Kentucky
- Fleming County, Kentucky
- Greenup County, Kentucky
- Mason County, Kentucky
- Nicholas County, Kentucky
- Rowan County, Kentucky

District 10

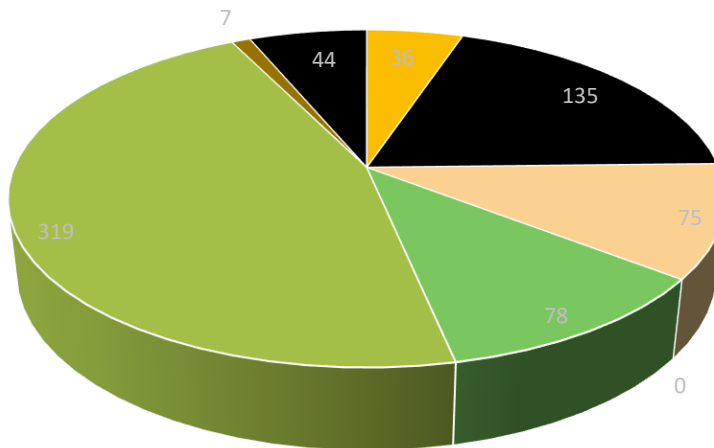
Estimate; Total: - Spanish: - Speak English less than "very well"



- Breathitt County, Kentucky
- Estill County, Kentucky
- Lee County, Kentucky
- Magoffin County, Kentucky
- Menifee County, Kentucky
- Morgan County, Kentucky
- Owsley County, Kentucky
- Perry County, Kentucky
- Powell County, Kentucky
- Wolfe County, Kentucky

District 11

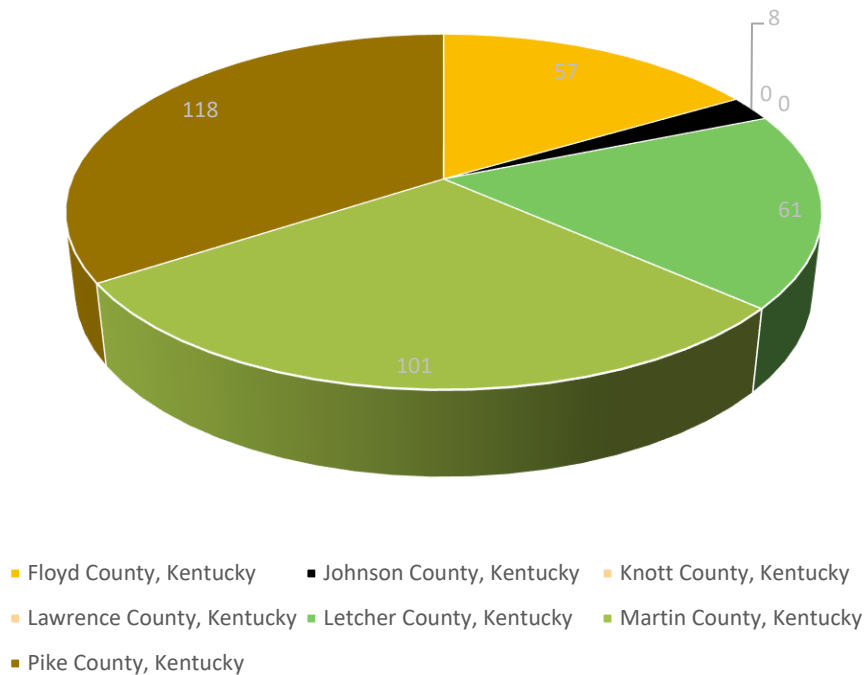
Estimate; Total: - Spanish: - Speak English less than "very well"



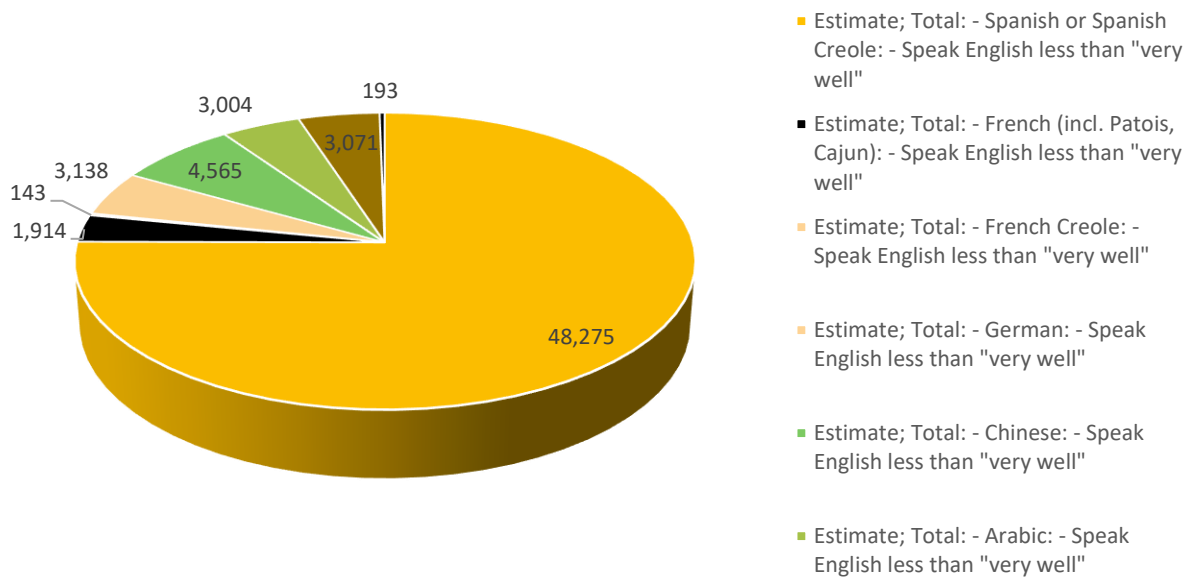
- Bell County, Kentucky
- Clay County, Kentucky
- Harlan County, Kentucky
- Jackson County, Kentucky
- Knox County, Kentucky
- Laurel County, Kentucky
- Leslie County, Kentucky
- Whitley County, Kentucky

District 12

Estimate; Total: - Spanish: - Speak English less than "very well"



Common LEP Languages Spoken in Kentucky



Factor 2 – Frequency with which LEP Individuals come-in- contact with KYTC Programs, Activities or Services.

According to data collected from assessments conducted in the area of LEP utilization, KYTC's Department of Vehicle Regulation has had contact with LEP individuals. A survey was sent (see **Appendix 1**) to managers

within the departments requesting their department's assistance with assessing KYTC's frequency with LEP individuals.

The survey was sent to KYTC's Department of Vehicle Regulation, the employees were asked to "please indicate with a "number" in the table below the frequency of which you communication with members of the public that LEP person(s). The languages below are the commonly spoken languages in Kentucky. If you have interactions with individuals who speak other languages please indicate what language (if you can identify the language) "Other" box, if you are unable to identify the language spoken please indicate by using the "all other languages" box" Below are the employee's responses to the survey.

Frequency of Contact with LEP Persons

Language	Most Days ²	At Least Once a Week	At Least Once a Month	At Least Once a Year	Never
Spanish	2	2	6	3	2
German			1		10
Chinese					11
French	1	3	1	3	7
Arabic	1				10
Other _____			3	1	2
Other _____					2
All Other Languages	1		1		2

A couple of the participants that indicated "other" wrote in that they interact with LEP individuals that spoke Ukrainian, Bosnian, Serbian and Croatian (at least once a month).

The participants held various positons within KYTC such as Administrative positions whose responsibilities ranged from, investigation of fraud to processing vehicle tax payments; the varying positions also provided for various responses regarding how the participants interacted with LEP individuals. KYTC employees who participated in the survey indicated that their interactions with LEP persons were via email, telephone or in person.

Factor 3 – The nature and importance of the programs, activities, or services provided by KYTC to the LEP Population

Transportation has an important role in the lives of the LEP population and the citizens of the Commonwealth of Kentucky. LEP individuals and minority communities are typically the populations that experience the greatest impact when transportation decisions are made. KYTC is dedicated to providing safe and dependable services to the LEP populations it serves as well as the people of the Commonwealth of Kentucky.

KYTC's critical services are those that provide customer service to the public, such as public transportation, right of way procurements, public involvement and safety with regard to construction and allowing access to file a complaint.

² Numbers in chart represent number of participant responses (i.e. two participants responded indicating that they interact with Spanish speakers on "most days."



KYTC will continue to monitor this area by communicating with community organizations that serve LEP individuals as well as with LEP persons.

Factor 4 – Resources available to the KYTC and overall cost

With respect to KYTC's resources, KYTC is currently in the planning phase of implementing the use of department employee volunteers. KYTC is looking into having their department employee volunteers certified. The Commonwealth of Kentucky has a contract with a translation and interpreter service company, the KYTC is currently researching the company to determine if the services provided effectively and efficiently meet the needs of KYTC's LEP populations based upon the various departments who come-in contact with LEP individuals, such as the Department of Vehicle Regulation. Some of the survey participants from the Department of Vehicle Regulation provided suggestions regarding having written and oral translation services to enhance LEP person's customer experience with KYTC.

The use of professional translation and interpreter services will be utilized should a situation occur in which department employees are unable or should not offer translation services, such as, an unfamiliar language or dialect, a legal matter or need for expert testimony. Payment for these professional services is expended when services are rendered.

N. Exceptions

No exceptions to this policy may-be-granted without the prior written approval of the KYTC Secretary or KYTC Executive Director of Office for Civil Rights and Small Business Development or the designated Language Access Program Officer of KYTC.

IV. Plan

A. Description of timeframe, objectives and benchmarks

The Kentucky Transportation Cabinet understands the importance of providing language assistance services to LEP individuals. As a leader in the transportation industry, it is our objective to serve all citizens of the Commonwealth in a manner that promotes equality and inclusiveness. Recently the Cabinet has undergone significant cuts in employment due to budgetary concerns and has limited resources available to implement new programs. However, even with limited resources available KYTC is moving forward with implementing its LAP. The KYTC plans to engage its staff to manage face-to-face interactions, telephone conversations, written communication and email discussions with LEP persons.

B. Compliance Objectives:

- 1 Interpreters are available to manage face-to-face interactions, phone calls and email messages at no cost to LEP persons.
- 2 The public is made aware that language assistance services are available. This includes but is not limited to posting of I Speak Cards so that they are visible to the public.
- 3 All vital documents are translated into the required identified languages and available to the public.
- 4 LEP training for KYTC employees who have contact with the public.
- 5 The KYTC shall maintain an official list that identifies certified staff to interpret and a list of volunteer to interpreters. This list shall-be maintained on OCRSBD's web page.



C. Bench Marks:

- 1 All LEP persons should receive a response within 24 hours and no later than 48 hours from the time of their initial contact. (Exceptions may be made in exigent circumstances)
- 2 All vital documents should-be-translated accurately with proper spelling, punctuation and grammar.
- 3 All communication with LEP persons should be professional in nature. Triennially, KYTC will survey LEP individuals to gage the compliance and professionalism of its services.
- 4 Accurately track the number of LEP persons, who come-in-contact with the cabinet.
An internal KYTC OCRSBD document will be utilized to determine timeframes and phases in which the entire LEP will be implemented.

V. Complaint Procedures

Any person, specific class of persons or entity that believes they have been subjected to discrimination as prohibited by the legal provisions of Title VI and related Nondiscrimination authorities on the basis of race, color, national origin, sex, age, disability, low-income or Limited English Proficiency may file a formal complaint with KYTCs Office for Civil Rights and Small Business Development. The Title VI Coordinator or Title VI Officer is responsible for receiving complaints. The LEP complaint process will follow the Title VI complaint process.

A formal complaint must-be-filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. Complaints shall be in writing and signed by the complainant(s) on the **External Discrimination Complaint TC 18-10 form (Appendix 2)**

KYTC OCRSBD will make a concerted effort to resolve complaints internally, using the agency's complaint procedures in accordance with the Title VI plan.

VI. Implementation Plan

A. Description of Timeframe

The Kentucky Transportation Cabinet understands the importance of providing language assistance services to LEP individuals. As a leader in the transportation industry, it is our objective to serve all citizens of the Commonwealth, in a manner promoting equality and inclusiveness. Recently the Cabinet has undergone significant cuts in employment due to budgetary concerns and has limited resources available to implement new programs. With limited resources, KYTC is moving forward with implementing its LAP. The KYTC plans to engage its staff to manage face-to-face interactions, telephone conversations, written communication and email discussions with LEP persons.

The plan will-be-implemented in four phases over a period of two years. KYTC anticipates that implementation will take place from July 1, 2019 to June 30, 2021. KYTC proposed plan ensures that it is fully compliant with all federal, state and local regulation regarding LEP persons. KYTC will measure its success by establishing benchmarks. Benchmarks will-be-evaluated by the timeliness and quality of responses for LEP services.



B. Compliance Objectives:

- 1) Interpreters are available to manage face-to-face interactions, phone calls and email messages at no cost to LEP persons.
- 2) The public is-made aware, that language assistance services are available. This includes but is not limited to posting of I Speak Cards so that they are visible to the public.
- 3) All vital documents are translated into the required identified languages and available to the public.
- 4) LEP training for KYTC employees who have contact with the general-public.
- 5) The KYTC shall maintain an official list that identifies staff who are-certified, to interpret and a list of volunteer to interpreters. This list shall-be-maintained on OCRSBD's web page.

C. Benchmarks:

- 1) All LEP persons should-be-responded to in 24 hour and no later than 48 hours from the time of their initial contact. (Exceptions may be made in exigent circumstances)
- 2) All vital documents should-be-identified and translated accurately with proper spelling punctuation and grammar.
- 3) All communication with LEP persons should be professional in nature. Annually KYTC will survey LEP individuals to gage the professionalism of its services.
- 4) The number of LEP persons who come-in-contact with the cabinet shall be accurately tracked.

D. Phase I

Phase I will ensure that the Department of Vehicle Regulation and Kentucky One Stop Shop are fully compliant and achieving the established benchmarks. Phase I will-be-implemented beginning July 1, 2019. It-is-expected the Department of Vehicle Regulation and Kentucky One Stop Shop should be in full compliance by October 31, 2020. OCRSBD staff will work closely with the commissioner of Vehicle Regulation and One Stop Shop management, ensuring compliance objectives. This will require that the Department of Vehicle Regulation utilize KYTC's certified interpreters and volunteer interpreters. Furthermore, full compliance may require that the Department of Vehicle Regulation hire a full time interpreter to its staff.

E. Description of Department of Vehicle Regulation

The Department of Vehicle Regulation is located at 200 Mero Street Frankfort Kentucky 40622 on the 2nd floor. The Department of Vehicle Regulation is responsible for overseeing Driver Services, vehicle Services and Motor Carriers. Additionally the Department of Vehicle Regulation is responsible for managing all of the KYTC Driver Licensing Regional Field Offices mentioned in Phases III and IV. The Department of Vehicle Regulation has the most contact with the public and fields the majority of phone calls and emails directed at KYTC.



F. Description of the One Stop Shop

The One Stop Shop is located at 200 Mero Street Frankfort Kentucky 40622 on the 2nd floor. The One Stop Shop houses Driver Services, Vehicle Services and Motor Carriers. The shop is open to the public from 8:00am to 4:00pm EST Monday through Friday.

The services offered by the one stop shop include:

- Determine eligibility of Non-US citizens who are applying for a KY driver's license or ID by verifying immigration documents and give a "Blue Letter" if eligible.
- Accept Alcohol Completions.
- Judgment-Satisfactions.
- Proofs of citations that have been satisfied in state and out-of-state.
- Reschedule traffic school.
- Hold discretionary and special hearings.
- Process \$15.00 enrollment fees for state traffic school.
- Process \$40.00 fees for reinstatement.
- Print \$3.00 driving records (CDL records, as well).
- Accept clearance letters from other states.
- Offer general information (including CDL information).
- Interstate Medical Waivers (CDL)
- Drop off CDL paperwork: medical card, self-certification, and/or commercial application

G. Phase II

In Phase II KYTC will ensure that KYTC Executive Offices and Departments are fully compliant and achieve the established benchmarks. Phase II will be implemented beginning November 1, 2019. It is expected that the KYTC Executive Offices and Departments will be in full compliance by March 30, 2020. OCRSBD staff will work closely with all executive directors and commissioners ensuring compliance objectives.

H. List of KYTC Executive Offices and Departments

Central Office is located at 200 Mero Street Frankfort Kentucky 40622. Central Office includes all of the following Offices and Departments (See Organizational Chart):

Office of the Secretary

Office of Public Affairs

Office for Civil Rights & Small Business Development

Office of Audits

Office of Budget & Fiscal Management

Office of Inspector General

Office of Legal Services

Office of Support Services

Office of Transportation Delivery

Office of Human Resource Management

Office of Information Technology



Department of Aviation
Department of Vehicle Regulation
Department of Highways
Office of Project Development
Office of project Delivery & Preservation
Office of Highway Safety
Office of Highway Districts 1-12
Department of Rural & Municipal Aid
Office of Local programs
Office of Rural & Secondary Roads

I. Phase III

Phase III will ensure that KYTC Driver Licensing Regional Field Offices in Lexington, Louisville and Florence are fully compliant and achieving the established benchmarks. Phase III will be implemented beginning April 1, 2020. It is expected that the KYTC Driver Licensing Regional Field Offices in Lexington, Louisville and Florence will be in full compliance by to October 31, 2021. OCRSBD staff will work closely with the commissioner of Vehicle Regulation and Office Management ensuring compliance objectives. The services offered by the field offices include all of the services offered by KYTC's One Stop Shop. These offices have been identified as having the most contact with LEP individuals.

J. Description of Division of the Lexington, KY Office

The Lexington Office is located at 1591 Winchester Rd. Lexington, KY 40505. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

K. Description of the Louisville, KY Office

The Louisville Office is located at Buechel Station Shopping Center 4109 Bardstown Road, Unit 105 Louisville, KY 40218. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

L. Description of the Florence, KY Office

The Florence Office is Located at 8120 Dream Street Suite A Florence, KY 41042. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

M. Phase IV

In Phase IV KYTC will ensure that all remaining eight (8) KYTC Driver Licensing Regional Field Offices are fully compliant and achieving the established benchmarks. Phase IV will be implemented beginning November 1, 2020. It is expected that all remaining eight (8) KYTC Driver Licensing Regional Field Offices will be in full compliance by June 30, 2021. OCRSBD staff will work closely with the commissioner of Vehicle Regulation



and Office Management ensuring compliance objectives. The services offered by the field offices include all of the services offered by KYTC's One Stop Shop.

N. Description of the Bowling Green, KY Office

The Bowling Green Office is located at 1001 Center Street, Suite 104 Bowling Green, KY 42101. The office is open to the public from 8:00am to 4:00pm CENTRAL Monday through Friday.

O. Description of the Catlettsburg, KY Office

The Catlettsburg Office is located at 3000 Louisa Street, Suite 2 Catlettsburg, KY 41129. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

P. Description of the Elizabethtown, KY Office

The Elizabethtown Office is located at 2819 Ring Road, Suite 201 Elizabethtown, KY 42701. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

Q. Description of the Hazard, KY Office

The Hazard Office is located at Perry County Courthouse 481 Main Street, 2nd Floor Hazard, KY 41702. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

R. Description of the Madisonville Office

The Madisonville Office is located at 10 South Main Street 2nd Floor Room 26 Madisonville, KY 42431. The office is open to the public from 8:00am to 4:00pm CENTRAL Monday through Friday.

S. Description of the Paducah Office

The Paducah Office is located at 2855 Jackson Street, Suite C. Paducah, KY 42001. The office is open to the public from 8:00am to 4:00pm CENTRAL Monday through Friday.

T. Description of the Prestonsburg Office

The Prestonsburg Office is located at Floyd County Justice Center 127 South Lake Dr. (1st Floor) PO BOX 1529 Prestonsburg, KY 41653. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

U. Description of the Somerset Office

The Somerset Office is located at 650 North Main St, Suite 228B 228 B Somerset, KY 42501. The office is open to the public from 8:00am to 4:00pm EST Monday through Friday.

V. Interpreter Certification

KYTC will utilize Language Line Solutions to administer and score its Interpreter Certification Examinations. Currently KYTC is in a yearlong contract with Language Line Solutions from June 9, 2018 to June 8, 2019. (See Contract) At the end of the contract term KYTC may renew its current contract or contract with another



vendor. The Operations contact for the Contract is the Executive Director of the OCRSBD. The Billing Contact is the Internal Policy Analyst III for the Office of Human Resources Training division and the Training Contact is the Title VI Coordinator of the OCRSBD.

Language Line Solutions has developed comprehensive tests to help interpreters, bilingual employees and organizations assess and attest their language and interpreting skills. **“All Language Line Academy tests have been validated by external experts or a psychometrician”.**

Language proficiency requires knowledge of grammar, vocabulary and syntax, among other things. The test is an oral proficiency interview conducted entirely in the tested language and designed to identify an individual’s level of linguistic proficiency. This test uses Interagency Language Roundtable (ILR) rating scale, which is widely accepted by the government agencies and education sector in the United States. Although fluency in two languages is required for interpreters, bilingualism alone is not sufficient to ensure that the bilingual individual has the specific skill-set needed for interpreting between the two languages.

W. Validation Statement Interpreter Skills Test (IST) Validation

To ensure the quality of its testing programs, Language Line Services worked with a professor from the Monterey Institute of International Studies, Dr. Eddine Dahel, who holds a Ph.D. in Management Sciences and specializes in quantitative analysis. He evaluated the Interpreter Skills Test to determine its validity as a testing instrument, by reviewing hundreds of tests performed over a two-year period and randomly selecting 346 tests for a statistical analysis. The statistical analysis proved at a 99.9% confidence level that the data collection, methodology and results of the tests are in conformance with accepted statistical standards and presented strong evidence of quality claims regarding the test’s accuracy and efficiency.

X. Use of Interpreters

When LEP services are-requested, KYTC will first attempt to utilize a certified interpreter from the Cabinets official list. All certified interpreters are-paid in accordance with guidelines set out by the Kentucky Personnel Cabinet. If a certified interpreter is unavailable, KYTC will then utilize a volunteer interpreter from the Cabinets official list. In the event that a particular office or department has more LEP contacts than can be managed by the certified and volunteer interpreters that office or department may have to hire an interpreter on staff. Due to budgetary concerns, KYTC will only utilize Language Line Solutions’ interpreters when necessary.

Y. Steps to Interpreter Certification

- 1) KYTC Employee Completes interpreter application (TC18-11)
- 2) OCRSBD's Executive Director, Civil Rights Manager and Title VI Coordinator Review Application
- 3) Determination of qualification is made by majority vote of LEP committee.
- 4) Schedule Test Time for Identified Language
 - a. To Schedule Test Time
 - i. Languageline.com
 - ii. Testing Tab
 - iii. Language Proficiency Tab
 - iv. Click Schedule any test now
 - v. Username and Password
 - vi. Submit New Request
 - vii. Add Test
 - viii. Interpreter Skills Test
 - ix. Enter Name of Applicant with (Customer Service) next to the name
 - x. Pick a time and a date
 - xi. Reserve Room 607 for time of the exam
 - xii. Pay using ID # 648003
- 5) Passes with a 75% or higher- The Applicant will be certified as an interpreter
- 6) Fill out Personnel Form and attach copy validation statement, certification certificate and score.
- 7) List Interpreter on official Cabinet document.

Z. Volunteer Interpreters

Certification is only required if interpreters want to be compensated for their service. KYTC employees may volunteer as interpreters. Competency to interpret does not necessarily mean formal certification as an interpreter. (USDOT LEP Guidance) Therefore, if a KYTC employee scores a 50% or higher on the certification examination but does not pass the examination they can volunteer to provide interpreter services. After six months, the KYTC will allow the volunteer to retest at no cost. The volunteer will have to fill out a new application for reconsideration. Volunteer interpreters will-be-added to the Cabinets official list.

AA. Translator Certification

Due to complexity of particular languages and ensuring accuracy of spelling, punctuation and grammar, KTYC will not certify its employees to translate documents. KYTC will utilize Language Line Solutions or another vendor to translate all of its vital documents.



VII. Appendixes

1. EMPLOYEE LEP FREQUENCY SURVEY

The Kentucky Transportation Cabinet (KYTC), as a recipient of federal financial assistance from the Federal Highway Administration (FHWA) is required to provide the appropriate measures to ensure that Limited English Proficiency (LEP)³ persons have meaningful language access to the programs, services and information provided by KYTC and KYTC's sub-recipients. In order to determine if written or oral communication must be translated a four-factor analysis is used. The four-factor analysis considers the following:

- **The number or proportion of LEP persons served or encountered in the eligible service population**
- **The frequency with which LEP individuals come in contact with the program, activity, or service**
- **The nature and Importance of the program, activity, or service provided by the program**
- **The resources available to the recipient and costs**

The Office for Civil Rights & Small Business Development (OCRSBD) is requesting your assistance with completing the four-factor analysis, if you would please take a moment, complete the attached questions, and return them:

**Office for Civil Rights and Small Business Development
200 Mero Street, Frankfort, KY 40622
(502) 564-3601**

If you could please return completed survey to the OCRSBD by the close of business on (insert date).

If you have any questions please do not hesitate to contact us.

Sincerely,

Vincent C. Thomas, Sr. Administrative Branch Manager
Office for Civil Rights and Small Business Development
200 Mero Street, Frankfort, KY 40622
(502) 564-3601
Vincent.Thomas2@ky.gov

³ An LEP person(s) is an individual(s) who has limited ability to read, write, speak or understand English.



What is your job title?

What are your job duties/responsibilities?

Please indicate with an “x” in the table below the frequency of which you communication with members of the public that LEP person(s). The languages below are the commonly spoken languages in Kentucky⁴. If you interact with individuals who speak other languages please indicate what language (if you can identify the language) “Other” box, if you are unable to identify the language spoken please indicate by using the “all other languages” box.

Frequency of Contact with LEP Persons


Language	Most Days	At Least Once a Week	At Least Once a Month	At Least Once a Year	Never
Spanish					
German					
Chinese					
French					
Arabic					
Other					
Other					
All Other Languages					

What is your method of communication when you are communicating with LEP person(s)?

Please provide suggestions on ways in which KYTC can improve communication efforts with LEP persons as it relates to your job duties/responsibilities. (Optional)

⁴ Data is from the American Community Survey using the data from the Language Spoke at Home By Ability to Speak English for the Population 5 years and Over Table

2. LEP COMPLAINT FORM

 <div style="display: inline-block; text-align: center;"> KENTUCKY TRANSPORTATION CABINET Office for Civil Rights and Small Business Development </div>		TC 18-16 Rev. 09/2018 Page 1 of 2			
TITLE VI COMPLAINT					
Instructions: Complete and sign this form, and then mail or fax it to the Kentucky Transportation Cabinet.					
<u>Address:</u> Kentucky Transportation Cabinet Office for Civil Rights & Small Business Development 200 Mero Street, 6 th Floor West Frankfort, KY 40622		<u>Fax:</u> Kentucky Transportation Cabinet Office for Civil Rights & Small Business Development Attn: Discrimination Complaint Coordinator (502) 564-2114			
SECTION 1: COMPLAINANT INFORMATION					
FIRST NAME	MI	LAST NAME	PHONE	ALTERNATE PHONE	EMAIL ADDRESS
MAILING ADDRESS (street)		CITY	STATE		ZIP
SECTION 2: COMPLAINT DETAILS					
Please indicate the basis of your complaint: <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin					
Provide the date and place(s) of the alleged discriminatory action(s). Please include the earliest date of discrimination and the most recent date of discrimination.					
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently than you. (Attach additional pages if necessary.)					
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances. Tell what action you took which you believe was the cause for the alleged retaliation. (Attach additional pages if necessary.)					
Names of individuals, agency, or department responsible for the discriminatory action(s):					
<u>Name:</u>		<u>Address:</u>		<u>Phone:</u>	
1. _____		_____		_____	
2. _____		_____		_____	
3. _____		_____		_____	
4. _____		_____		_____	



KENTUCKY TRANSPORTATION CABINET
Office for Civil Rights and Small Business Development

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TITLE VI COMPLAINT

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: *(Attach additional pages if necessary.)*

	<u>Name:</u>	<u>Address:</u>	<u>Phone:</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

Please provide any additional information and/or photographs, if applicable, that you believe will assist with an investigation. *(Attach additional pages if necessary.)*

Photographs submitted with complaint? ☐ Yes ☐ No

SECTION 3: ACTIONS

Have you filed, or do you intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. *(Check all that apply.)*

<input type="checkbox"/> U.S. Department of Transportation _____	<input type="checkbox"/> Office of Federal Contract Compliance Programs _____
<input type="checkbox"/> Federal Highway Administration _____	<input type="checkbox"/> U.S. Equal Employment Opportunity Commission _____
<input type="checkbox"/> Federal Transit Administration _____	<input type="checkbox"/> U.S. Department of Justice _____
<input type="checkbox"/> Other _____	

Have you discussed the complaint with any KYTC representative? ☐ Yes ☐ No

If yes, provide the name, position, and date of discussion.

Name of KYTC Representative	Position of Representative	Date of Discussion
-----------------------------	----------------------------	--------------------

Do you have an attorney regarding this matter? ☐ Yes ☐ No

If yes, please provide attorney's contact information.

Name of Law Firm	Name of Representing Attorney
Mailing Address	Phone

Briefly explain what remedy or action you are seeking for the alleged discrimination.

We cannot accept an unsigned complaint. Please sign and date the complaint form below.


Complainant's Signature	Date
-------------------------	------

FOR OFFICE USE ONLY

Date Complaint Received: _____	Case #: _____
Processed by: _____	Date Referred: _____
Referred to: <input type="checkbox"/> U.S. DOT <input type="checkbox"/> FHWA <input type="checkbox"/> FTA <input type="checkbox"/> OFCCP <input type="checkbox"/> Other _____	



3. LEP COMPLAINT FORM (SPANISH)

 KENTUCKY TRANSPORTATION CABINET (GABINETE DE TRANSPORTE DE KENTUCKY) Office for Civil Rights and Small Business Development (Oficina de derechos civiles y desarrollo de pequeñas empresas) External Discrimination Complaint (Reclamo externo de discriminación)		TC 18-10 Spanish Rev. 04/2019 Página 1 de 2			
Instrucciones: Complete y firme este formulario, y luego envíelo por correo o fax al Gabinete de Transporte de Kentucky.					
<u>Dirección:</u> Gabinete de Transporte de Kentucky Oficina de derechos civiles y desarrollo de pequeñas empresas 200 Mero Street 6 th Floor West Frankfort KY 40622		<u>Fax:</u> Gabinete de Transporte de Kentucky Oficina de derechos civiles y desarrollo de pequeñas empresas Atención: Coordinador de reclamos de discriminación (502) 564-2114			
SECCIÓN 1: INFORMACIÓN DEL RECLAMANTE					
PRIMER NOMBRE	SEG NOM	APELLIDO	TELÉFONO	TELÉFONO ALTERNATIVO	DIRECCIÓN DE CORREO ELECTRÓNICO
DIRECCIÓN POSTAL (calle)			CIUDAD		IIIP DEL ESTADO
SECCIÓN 2: DETALLES DEL RECLAMO					
Indique la base de su reclamo:					
<input type="checkbox"/> Raza _____ <input type="checkbox"/> Género _____ <input type="checkbox"/> Nacionalidad _____ <input type="checkbox"/> Color _____ <input type="checkbox"/> Discapacidad _____ <input type="checkbox"/> Inglés limitado (LEP, por sus siglas en inglés) _____ <input type="checkbox"/> Edad _____ <input type="checkbox"/> Bajos ingresos _____					
Indique las fechas y los lugares de las presuntas acciones discriminatorias. Incluya la fecha más temprana y la fecha más reciente de discriminación.					
¿De qué manera lo discriminaron? Describa la naturaleza de la acción, la decisión o las condiciones de la presunta discriminación. Explique lo más claramente posible qué sucedió y por qué cree que su condición de protección (base) fue un factor en la discriminación; incluya de qué manera se trato de modo diferente a otras personas. (Adjunte páginas adicionales si es necesario.)					
La ley prohíbe la intimidación o las represalias contra alguien por haber tomado medidas o haber participado en acciones para garantizar los derechos protegidos por estas leyes. Si siente que ha sido víctima de represalias, aparte de la discriminación que se alega anteriormente, explique las circunstancias. Indique la acción que usted tomó y que cree que fue la causa de la supuesta represalia. (Adjunte páginas adicionales si es necesario.)					
Nombres de los individuos, la agencia o el departamento responsables de las acciones discriminatorias:					
<u>Nombre:</u>		<u>Dirección:</u>		<u>Teléfono:</u>	
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____



KENTUCKY TRANSPORTATION CABINET
(GABINETE DE TRANSPORTE DE KENTUCKY)

Office for Civil Rights and Small Business Development
(Oficina de derechos civiles y desarrollo de pequeñas empresas)

TC 18-10 Spanish

Rev. 04/2019

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External Discrimination Complaint
(Reclamo externo de discriminación)

Nombre de las personas (testigos, compañeros de trabajo, supervisores u otros) con quienes podemos comunicarnos para obtener información adicional para respaldar o aclarar su reclamo: (Adjunte páginas adicionales si es necesario).

Nombre:

Dirección:

Teléfono:

1. _____
2. _____
3. _____
4. _____

¿Se presentaron fotografías con el reclamo? ☐ Sí ☐ No

SECCIÓN 3: ACCIONES

¿Ha presentado o tiene la intención de presentar un reclamo con respecto al asunto planteado con alguna de las siguientes instituciones? En caso afirmativo, indique las fechas de presentación. (Marque todo lo que corresponda).

- ☐ Departamento de Transporte de los EE. UU. _____
- ☐ Oficina de Programas de Cumplimiento de Contratos Federales _____
- ☐ Administración Federal de Carreteras _____
- ☐ Comisión de Igualdad de Oportunidades de Empleo de los EE. UU. _____
- ☐ Administración Federal de Transporte _____
- ☐ Departamento de Justicia de los EE. UU. _____
- ☐ Otro _____

¿Ha analizado el reclamo con algún representante del Gabinete de Transporte de Kentucky (KYTC, por sus siglas en inglés)? ☐ Sí ☐ No

En caso afirmativo, indique el nombre, el puesto y la fecha de la discusión.

Nombre del representante de KYTC	Puesto del representante	Fecha del análisis
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¿Tiene usted un abogado para este asunto? ☐ Sí ☐ No

Si es así, por favor proporcione la información del contrato del abogado

Nombre del estudio de abogados	Nombre del abogado representante
Dirección postal	Teléfono

Explique brevemente qué solución o medida está solicitando para la presunta discriminación.

No podemos aceptar un reclamo sin firmar. Firme y coloque la fecha en el formulario de reclamo a continuación.

Firma del reclamante

Fecha

FOR OFFICE USE ONLY (PARA USO INTERNO UNICAMENTE)

Date Complaint Received: _____ Case #: _____
Processed by: _____ Date Referred: _____
Referred to: ☐ U.S. DOT ☐ FHWA ☐ FTA ☐ OFCCP ☐ Other _____



4. KYTC TITLE VI NOTICE TO THE PUBLIC



Matthew G. Bevin
Governor

COMMONWEALTH OF KENTUCKY
TRANSPORTATION CABINET
Frankfort, Kentucky 40622
www.transportation.ky.gov/

Greg Thomas
Secretary

KYTC TITLE VI NOTICE TO THE PUBLIC

The Kentucky Transportation Cabinet (KYTC) hereby gives notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related Nondiscrimination authorities in all programs and activities. It is KYTC's policy that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, disability, low-income, or Limited English Proficiency be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs or activities receiving Federal financial assistance.

Any person who believes they have been subjected to discrimination under the Title VI and related Nondiscrimination authorities has the right to file a formal complaint.

To request or receive additional information on its discrimination obligations, including its complaint procedures, please contact the person listed below or visit the administrative office at the address listed below:

Kentucky Transportation Cabinet
Office for Civil Rights and Small Business Development
Title VI Coordinator
200 Mero Street
6th Floor West
Frankfort, Kentucky 40622
Telephone: 502-564-3601
Website: <https://transportation.ky.gov/Civil-Rights-and-Small-Business-Development/Pages/Civil-Rights.aspx>

To file a discrimination complaint, the written complaint must be submitted to the address above within 180 days of the alleged discrimination. Written complaints may also be submitted to the U.S. Department of Transportation/Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by the FTA, at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 To accommodate limited English proficient individuals, oral complaints to be documented and/or translated may also be given at the above address.



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5. KYTC STANDARD TITLE VI ASSURANCE



Matthew G. Bevin
Governor

COMMONWEALTH OF KENTUCKY TRANSPORTATION CABINET

Frankfort, Kentucky 40622
www.transportation.ky.gov

Greg Thomas
Secretary

OFFICIAL ORDER 110248

STANDARD TITLE VI ASSURANCE

Kentucky Transportation Cabinet

Standard Title VI Assurances

The Kentucky Transportation Cabinet, (hereinafter referred to as the "Recipient") hereby agrees that as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78Stat. 252, 42 U.S.C. 2000d-4 (hereinafter referred to as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, (49 CFR, Part 21) Nondiscrimination in Federally Assisted Program of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the U.S. Department of Transportation, including the Federal Highway Administration, and hereby gives assurance that it will promptly take any necessary measures to effectuate this agreement. This assurance is required by subsection 21.7(a) (1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specifics assurances with respects to its Federal-aid Highway Program:

1. That the Recipient agrees that each "facility" and each "program" as defined in subsections 21.23(b) and 21.23(e) of the Regulations will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal-aid Highway Program and, in a adapted form in all proposals for negotiated agreements.



An Equal Opportunity Employer M/F/D



Construction Proposals

The Kentucky Transportation Cabinet, Department of Highways in accordance with the provisions of the Title VI of the Civil Rights Act of 1964 (78 Stat. 252) and the regulations of the Federal Department of Transportation (49 CFR, Part 21), issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that the contract entered into pursuant to this advertisement will be awarded to the lowest responsible bidder without discrimination on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability.

Agreements for Other Services

Compliance with Regulations: The Consultant shall comply with the regulations of the Transportation Cabinet, Department of Highways, relative to nondiscrimination in Federally Assisted Programs of the Transportation Cabinet, Department of Highways (49 CFR, Part 21) which are herein incorporated by reference and made a part of this contract.

3. That the Recipient shall insert one of these nondiscrimination clauses in every contract subject to the Act and the Regulations.
4. That the Recipient shall also insert into every relevant contract a clause stating that the contractors will not discriminate against any employee or applicant for employment because of race, color, national origin, sex age (over 40), religion, sexual orientation, gender identity, veteran status, or disability.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, these assurances shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form of, or for the acquisition of real property, these assurances shall extend to rights to space on, over, or under such property.
7. That these assurances obligate the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, real property or interest therein or structures or improvement thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose




involving the provision of similar services or benefit; or (b) the period during which the Recipient retains ownership or possession of the property.


8. The recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the delegated authority, to give a reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed by or pursuant to the Act, the Regulations and these assurances
9. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and these assurances.

These assurances are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts, and/or other Federal financial assistance extended after the date hereof, to the Recipient by the U.S. Department of Transportation under the Federal-aid Highway Program. The person whose signature appears below is authorized to sign these assurances on behalf of the Recipient.

Signed and approved this 27th day of June, 2016


Greg Thomas, Secretary
Kentucky Transportation Cabinet

APPROVED AS TO FORM AND LEGALITY



Todd Shipp, Esq., Special Assistant
Office of Legal Services

6. I SPEAK CARDS

English Translation:

1. Point to your language.
2. An Interpreter will be called.
3. The interpreter is provided at no cost to you.

American Sign Language  Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.	Korean  귀하께서 사용하는 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.
Arabic  اشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما سيتم إحضار المترجم الفوري مجاناً.	Mandarin  請指認您的語言，以便為您提供免費的口譯服務。
Bengali  আপনার ভাষার দিকে নির্দেশ করুন। একজন দোভাষীকে ডাকা হবে। দোভাষী আপনি নিখরচায় পাবেন।	Nepali  आफ्नो भाषातर्फ अर्ल्याउनुहोस्। एक दोभाषीलाई बोलाइनेछ। तपाईंको बिना कुनै खर्चको, एकजना दोभाषी उपलब्ध गराइनेछ।
Burmese  သင့်ဘာသာစကားကို ညွှန်ပြပါ။ ကောင်းပြန် ခေါ်ဝေါ်ပါမယ်။ သင့်အတွက် ကောင်းပြန် တစ်ယောက် ပေးပါမယ်။	Polish  Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.
Cantonese  請指認您的語言，以便為您提供免費的口譯服務。	Portuguese  Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.
Farsi  زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.	Punjabi  ਅਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆ ਦੀ ਮੁਫਤ ਇੰਤਜਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।
French  Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.	Romanian  Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret caare vă este asigurat gratuit.
Haitian Creole  Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.	Russian  Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.
Hindi  अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए द्वापिवा बुलाया जाएगा। आपके लिए द्वापिवा की निशुल्क व्यवस्था की जाती है।	Somali  Farta ku fiiqluqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.
Hmong  Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.	Spanish  Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.
Italian  Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.	Tagalog  Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.
Japanese  あなたの話す言語を指してください。 無料で通訳サービスを提供します。	Vietnamese  Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.



7. Limited English Proficiency Committee Notice



Title VI of the Civil Rights Act of 1964 and its implementing regulations, along with Executive Order 13166 dated August 11, 2000, require federal agencies and recipients of federal funds to take reasonable steps to ensure that Limited English Proficiency (LEP) individuals have meaningful access to programs, services and activities provided by or funded by the federal government.

In this endeavor, the Cabinet's Office for Civil Rights and Small Business Development (OCSBD) has formed a LEP Committee. The monthly meetings are in the Transportation Cabinet's conference room number, 607 and are held every second Monday of every month.

The committee continues meeting regularly to discuss developments in specific Title VI program areas, research, make recommendations on creating a language assistance policy and plan to ensure meaningful access to cabinet programs and activities by LEP persons.

The type of language assistance a recipient/covered entity provides to ensure meaningful access will depend on a variety of factors, including the size of the recipient/covered entity, the size of the eligible LEP population it serves, the nature of the program or service, the objectives of the program, the total resources available to the recipient/covered entity, the frequency with which particular languages are encountered and the frequency with which LEP persons come into contact with the program.

Vincent C. Thomas, Sr. Administrative Branch Manager/Title VI Officer
Kentucky Transportation Cabinet
Office for Civil Rights and Small Business Development
200 Mero Street, Frankfort, KY 40622
Phone: 800-928-3079 or 502-564-3601
Fax: 502-564-1491





Contact Information

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Office for Civil Rights and Small Business Development
200 Mero Street, Sixth Floor West
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